

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA

IN THE MATTER OF:)	Case No. BK 13-80946
)	Chapter 13
Scott J. Stark,)	MOTION FOR AUTHORIZATION
Toni L. Stark,)	TO ENTER INTO A MODIFICATION
)	OF A MORTGAGE LOAN
Debtors.)	

COMES NOW the Debtors in the above captioned matter, by and through their undersigned attorney of record, and hereby moves the Court to grant permission for the Debtors to enter into a modification of their mortgage loan. In support of this motion, the Debtors state the following:

1. That the Debtors filed a voluntary petition April 29th, 2013 and currently are making payments to the Chapter 13 Trustee. That the plan is confirmed.
2. That the Debtors have a current mortgage with Nationstar Mortgage with an approximate balance of \$367,904.05.
3. That the Debtors wish to modify their loan with Nationstar Mortgage in order to allow them to bring their mortgage payments current. The loan would be for approximately \$367,904.05 for 40 years with an interest rate of 4.00%.
4. That modifying their mortgage would lower their interest rate from 4.63% to 4.00% and change their monthly payment from \$2,509.93 to \$2,763.06 a month.

WHEREFORE, the Debtors respectfully request that the Court allow them to modify their home loan as set forth in the terms above.

Dated: November 19, 2015

Scott Stark,
Toni Stark,
Debtors.

/s/ Francis X. Skrupa
Francis X. Skrupa #19722
11711 Arbor St., Ste 100
Omaha, NE 68144
Attorney for the Debtor

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA

IN THE MATTER OF:)	Case No. BK 13-80946
)	Chapter 13
Scott Stark,)	
Toni Stark,)	
Debtors.)	

NOTICE SETTING RESISTANCE DEADLINE

Pursuant to Neb. R. Bankr. P. 9013-1, You are hereby notified as follows:

1. Francis X. Skrupa, attorney for the above captioned debtor, has filed a MOTION FOR AUTHORIZATION TO ENTER INTO A LOAN MODIFICATION.
2. The last day to file a resistance to the Motion to Borrow/Incur Debt is November 30, 2015. The Resistance must be served on Debtors' counsel.
3. If the resistance period expires without the filing of any resistance, and declaration, the Court will consider entering an order granting the relief sought without further notice or hearing.

Dated: November 19, 2015

By: /s/ Francis X. Skrupa
Francis X. Skrupa, #19722
11711 Arbor St., Ste 100
Omaha, NE 68144
(402) 571-2900

CERTIFICATE OF SERVICE

I hereby certify that on November 19, 2015, I electronically filed the foregoing with the Clerk of the Bankruptcy Court using the CM/ECF system and hereby certify I have electronically notified Kathleen Laughlin, Chapter 13 Trustee via CM/ECF and mailed the foregoing document by U. S. mail, postage prepaid to all parties in interest as noted on the attached matrix:

Bank Of America Po Box 1598 Norfolk, VA 23501	Internal Revenue Service Attn: Insolvency Unit PO Box 21126 Philadelphia, PA 19114	Us Bank Us Bank
Bank Of America, N.a. 450 American St Simi Valley, CA 93065	John Deere P.O. Box 6600 Johnston, IA 50131	Us Bank Po Box 5227 Cincinnati, OH 45201
Bank Of The West 2527 Camino Ramon San Ramon, CA 94583	Nationstar Mortgage LLC 350 Highland Dr Lewisville, TX 75067	Us Bank Hogan Loc Po Box 5227 Cincinnati, OH 45201
Chase Po Box 15298 Wilmington, DE 19850	Nationwide Bank	Us Bk Rms Cc 205 W 4th St Cincinnati, OH 45202
Chase Po Box 15298 Wilmington, DE 19850	Nebraska Department Of Revenue P.O. Box 94818 Lincoln, NE 68509	US Department of Education Office Of General Counsel 600 Independence Ave., S. W. Room 5442 Washington, DC 20202
Chase Po Box 15298 Wilmington, DE 19850	Nebraska Furniture Mar 700 S 72nd St Omaha, NE 68114	US Department of Education Office Of Post Secondary Education 50 Beale St., Ste. 900 San Francisco, CA 94105- 1863
Dexone 9394 W Dodge Rd # 300 Omaha, NE 68114	Nissan Motor Acceptanc Po Box 660360 Dallas, TX 75266	Us Dept Of Education Attn: Borrowers Service Dept Po Box 5609 Greenville, TX 75403
Discover Fin Svcs Llc Po Box 15316 Wilmington, DE 19850	Sheffield Fn Bb T/Attn: Bankruptcy Department Po Box 1847 Wilson, NC 27894	Walentine O'Toole PO Box 540125 Omaha, NE 68154
Douglas County Attorney 1701 Farnam Street 100 Hall Justice Omaha, NE 68183	Sheffield Fn Po Box 1704 Wilson, NC 27894	Wells Fargo Card Ser 1 Home Campus 3rd Floor Des Moines, IA 50328
Douglas County Treasurer 1819 Farnam Street #H-03 Omaha, NE 68183-0003	State Farm Insurance P.O. Box 52268 Phoenix, AZ 85072-2268	
Internal Revenue Service Insolvency 1616 Capitol Ave, Stop 5300 Omaha, NE 68102	Toyota Motor Credit Toyota Financial Services Po Box 8026 Cedar Rapids, IA 52408	

/s/Francis X. Skrupa